

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRITTANI DANETTE ATKINS,)	
)	
Plaintiff,)	Case No.: 1:21-cv-02408
)	
v.)	Honorable Robert M. Dow, Jr.
)	
HEALTHCARE REVENUE RECOVERY)	Magistrate Judge Young B. Kim
GROUP, L.L.C.,)	
)	
Defendant.)	

**HRRG’S UNOPPOSED MOTION FOR AN EXTENSION OF CASE MANAGEMENT
DEADLINES**

Healthcare Revenue Recovery Group, L.L.C. (“HRRG”) by and through its attorneys of Gordon Rees Scully Mansukhani, LLP, submits the following unopposed motion for an extension of case management deadlines. Plaintiff’s counsel does not oppose the extension requested herein. HRRG and Plaintiff have not made any prior requests for an extension of any deadlines.

1. This motion is being filed pursuant to the Procedures in cases assigned to the Honorable Judge Robert M. Dow Jr. which provides: “A party seeking an extension of time must contact all other parties in the case to determine whether the motion is opposed. The party seeking the extension should indicate in the motion (i) the reason for the request, (ii) the number of previous extensions, and (iii) whether the motion is opposed.”

2. This motion is unopposed and no prior extensions have been requested.

3. The Court entered a Scheduling Order on July 12, 2021, providing, an updated joint status report is due no later than 10/1/2021, fact discovery to be completed by 10/1/2021, expert discovery to be completed by 11/1/2021, and dispositive motions due by 12/1/2021. [Doc. 15].

4. HRRG with consent filed a joint status report on October 1, 2021 pursuant to the

court's order.

5. Ms. Atkins' discovery responses were also due to HRRG on October 1, 2021.

6. HRRG has agreed to extend Plaintiff's deadline to respond to written discovery requests to October 15, 2021.

7. Additionally, Ms. Atkins has a motion to compel pending, with HRRG's response due by October 8, 2021. [Doc. 23].

8. In light of the above, the parties respectfully request an extension of their upcoming case management deadlines.

9. The parties request the deadlines in [Doc. 15] be extended as follows: fact discovery to be completed by 1/1/2021, expert discovery to be completed by 1/1/2021, and dispositive motions due by 2/1/2021.

10. This motion is not being brought to unduly delay these proceedings or to harass any party to this case.

WHEREFORE, HRRG respectfully requests that this Honorable Court grant an extension of the deadlines in this Court's scheduling order. [Doc. 15]

Respectfully submitted,

**GORDON REES
SCULLY MANSUKHANI, LLP**

Dated: October 1, 2021

/s/ Paul Gamboa
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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of Court using the electronic filing system on October 1, 2021, which will automatically send email notification of such filing to all attorneys of record.

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Respectfully submitted,

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